

## Exhibit H

### Qilin Cheng Declaration

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Civil Action No.: 1:18-cv-1046

HUI MINN LEE,  
*Plaintiff,*

vs.

MARKET AMERICA, INC.,  
*Defendant.*

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*Declaration of Qilin Cheng*

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I, Qilin Cheng, declare under penalty of perjury pursuant to 28 USC §1746 as follows:

1. My name is Qilin Cheng, and I am over the age of eighteen (18) years.
2. I give this declaration freely and voluntarily, and I am mentally competent to attest to the facts stated herein.
3. The statements herein are based on my personal knowledge, and are true to the best of my knowledge.
4. I began employment with Market America in March, 2017, when I was hired as an Unfranchise Services Representative.
5. I am of Asian origin, and speak multiple languages, including English and Mandarin (Chinese).
6. I attended the March, 2017 Unfranchise Services Mandarin-Speaking new hire training that was taught by Hui Minn “Nadine” Lee. The training was conducted in Mandarin for customer service representatives who predominately spoke Mandarin and could not understand the English training. During the training, Ms. Lee was exceptional. She was very informative and eager to teach. I found her training style to be very engaging and well performed. She was

always available to answer questions and explain issues in detail. I found her to be a team player who worked well with others.

7. After completion of the training, I was able to perform my duties without any problems. I did not hear any complaints about Ms. Lee's training methods from any other trainee working with Market America on the same job.

I declare under penalty of perjury that the foregoing is true and correct.

This the 3<sup>rd</sup> day of June, 2021.

Qilin Cheng

A large, stylized handwritten signature in black ink, written over a horizontal line. The signature is cursive and appears to be the name 'Qilin Cheng'.